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REVIEW OF SEMI-ANNUAL MONITORING REPORT- WESTLANDS COALITION

On 29 December 2005, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) received the Semi - Annual Monitoring Report (Semi-Annual Report) for the Westlands Coalition (Coalition). This report was submitted by the Coalition to meet the conditions of the Monitoring and Reporting Program (MRP) Order No. RB5-2005-0833 for Coalition Groups under Resolution No. R5-2003-0105 and the associated Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands adopted by the Central Valley Water Board on 15 August 2005.

The Coalition submitted the Semi-Annual Report via email and did not include any monitoring data. At the time of the submission of Semi-Annual Report, the Coalition maintained that its irrigation practices never result in runoff from the fields and that the flow in the water bodies is insufficient to allow sample collection or any monitoring. Therefore, the Coalition did not collect samples, and the Semi-Annual Report did not contain any monitoring data. Since then, the Central Valley Water Board Staff and the Coalition have been in frequent communications to address some improvements to the Coalition's Monitoring and Reporting Program Plan (MRP Plan) to ensure the collection of samples. These improvements to the MRP Plan were mainly focused on:

1. Rationale for triggering storm water sampling.
2. Monitoring site information to address the requirement for 20% intermediate drainages as described in Order No. RB5-2005-0833, and
3. Photo-monitoring during storm and irrigation season.

As a result of these frequent communications and agreements, Central Valley Water Board is expecting to receive the second Semi-Annual Report on **30 June 2006** that will cover the period of 1 November 2005 through 30 April 2006. This second Semi-Annual Report should include the following items (in addition to the requirements listed in the MRP Order No. RB5-2005-0833, page 14 Section C):

- (1) Storm water monitoring results for 15 March 2006 storm event and possibly one subsequent storm event.
- (2) Photo-monitoring for the 15 March 2006 storm event and one other storm event.
- (3) Quality Assurance Program Plan (QAPP) revised version.

(1) *Storm water monitoring results for 15 March 2006 storm event.*

In regards to any and all storm event monitoring the Central Valley Water Board will be expecting from the Coalition submission of the monitoring results, which will include:

- Phase I, which includes the analyses of physical parameters, drinking water constituents, pesticide use evaluation, 303 (d) pollutants, and toxicity testing (Order No. R5-2005-0833).
- USGS flow records at these monitoring locations.

(2) *Photo-monitoring.*

As part of the monitoring results for the 15 March 2006 storm event, and any subsequent storm events (up to two), the Central Valley Water Board is also expecting to receive from the Coalition photo-monitoring documentation. Photo-monitoring will be needed especially when samples are not collected based on reports of insufficient runoff.

(3) *Quality Assurance Program Plan (QAPP) revised version.*

Since the schedule for monitoring phases has been modified, the Coalition needs to submit a revised QAPP that contains the requirements of the MRP Order No. RB5-2005-0833 (Attachment B, page 2). In addition, some of these requirements were missing or not complete in the Coalition's QAPP submitted on 20 March 2004. Some of the items that need completion are:

- Title page and approval (including the appropriate signatures).
- Contract information (What laboratory the Coalition is going to use for the analytical services and contract samplers).
- Field Sheet. The Coalition did include field forms in the MRP Plan. However, the Central Valley Water Board staff recommends that the Coalition submit this information in a format such as those provided in the attachments (Figures 1 and 2). Thus, most of the information recorded at the field such as type of field quality control collected, the instruments used, other comments (if any), regarding site environmental and weather conditions, and any other relevant information that might explain a particular analytical result.
- QC Sample collection. Matrix spikes and matrix spikes duplicates should be analyzed at the rate of one per sample batch to achieve the overall rate of 5 % field duplicate samples and 5%

field blanks for each analysis, or one set per sampling event, whichever is more frequent, instead of “once a year” as indicated in the Coalition QAPP.

- Analytical laboratory details such as: analytical methods requirements, chemistry analysis, toxicity testing, detection and quantitation limits, laboratory standards and reagents, and so forth (Section 4 and 5 of MRP Order No. RB5-2005-0833 in Attachment B, page 2) are also required.

These requirements and criteria shall be presented in the QAPP as a means to assure that data collected represents, as closely as possible, *in situ* conditions of the water body. These set of requirements need to be included in the Coalition MRP Plan QAPP which is a separate document than the contract laboratory QAPP.

If you have any questions regarding this letter, please contact me at 916-464-4843
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ORIGINALLY SIGNED BY

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Attachment: (1) Figure 1. Field Sheet example for water
(2) Figure 2. Field Sheet example for sediment

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